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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

2-WAY COMPUTING, INC., a Nevada  
 corporation,  
  
 Plaintiff,  
  
 v.  
  
 UNIFY INC. F/K/A SIEMENS ENTERPRISE  
 COMMUNICATIONS, a Delaware corporation,  
  
 Defendant.

**Case No.: 2:16-cv-00423-GMN-CWH**  
  
  
**UNOPPOSED MOTION AND**  
**[PROPOSED] ORDER TO EXTEND**  
**DEADLINE FOR DEFENDANT TO**  
**RESPOND TO COMPLAINT**  
  
**(FIRST REQUEST)**

Plaintiff 2-Way Computing, Inc. ("Plaintiff") hereby files this Unopposed Motion and [Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance with LR 6-1, 6-2, and 7-1. This is the first request to extend the proposed deadline. This request is not made after the response deadline.

The Complaint (Doc. 1) was filed on February 29, 2016 and was served on Unify, Inc. on or about March 21, 2016. The current deadline to respond to the Complaint is April 11, 2016.

The parties believe that the litigation of this matter will be best served by allowing an additional thirty (30) days to discuss possible settlement of this matter and allow Defendant

1 additional time to investigate the claims of the Complaint and obtain Nevada counsel. Because an  
2 attorney for Defendant has not made an appearance in this case, Plaintiff files this motion to  
3 extend Defendant's deadline as an unopposed motion.

4 Accordingly, Plaintiff respectfully requests that this Court grant its request to continue the  
5 deadline for Defendant to respond to the Complaint until May 11, 2016.

6  
7 **BORGHESE LEGAL, LTD.**

8 */s/ Mark Borghese*

9 DATED: April 7, 2016.

10 Mark Borghese, Esq.  
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Las Vegas, Nevada 89145

11 **RUSS, AUGUST & KABAT**  
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15 **ORDER**

16  
17 **IT IS SO ORDERED.**

18   
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: April 8, 2016  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing document has been served on April 7, 2016 to all counsel of record via the Court's CM/ECF system.

Dated: April 7, 2016

/s/ Mark Borghese